

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

In Re C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation	)	MDL No. 2187
_____	)	
	)	
In Re American Medical Systems, Inc. Pelvic Repair System Products Liability Litigation	)	MDL No. 2325
_____	)	
	)	
In Re Boston Scientific Corp. Pelvic Repair System Products Liability Litigation	)	MDL No. 2326
_____	)	
	)	
In Re Ethicon, Inc., Pelvic Repair System Products Liability Litigation	)	MDL No. 2327
_____	)	
	)	
In Re Coloplast Corp. Pelvic Support Systems Products Liability Litigation	)	MDL No. 2387
_____	)	
	)	
In Re Cook Medical, Inc. Pelvic Support Systems Products Liability Litigation	)	MDL No. 2440
_____	)	

**APPLICATION OF WILLARD JAMES MOODY, JR. FOR  
APPOINTMENT TO PLAINTIFFS' STEERING COMMITTEE**

Willard J. Moody, Jr., Esquire, respectfully submits credentials and requests to be considered for appointment to the Plaintiffs' Steering Committee for Multidistrict Litigation MDL 2187, 2325, 2326, 2327, 2387 and 2440. Mr. Moody is willing and able to commit his resources and those of his firm to this litigation. Mr. Moody has experience in this type of complex litigation. He is counsel on all Pelvic Repair System Product cases involving Plaintiffs in this MDL and has already conducted discovery depositions in MDL 2325 and 2326.

1. Willard J. Moody, Jr. is the Vice President of The Moody Law Firm headquartered in Portsmouth, Virginia. The Moody Law Firm is primarily a personal injury firm handling serious injury claims, Federal Employers' Liability Act cases, Product Liability claims and Mass Torts involving pharmaceutical products and medical devices.

2. He received his Bachelor of Arts degree from Elon College in 1979 and graduated from T.C. Williams School of Law, University of Richmond, Virginia in 1983. Mr. Moody had dedicated his legal career to representing plaintiffs in Product Liability and Federal Employers' Liability Act cases and has been either lead counsel or co-counsel in cases in almost every state in America. In addition to being senior lead trial attorney in The Moody Law Firm, Mr. Moody heads up the Mass Tort Division of the firm which has represented over 20,000 individuals for asbestos related injuries nationwide. He has also been involved in medical device and pharmaceutical litigation involving products, including but not limited to Vioxx, Fosamax, Zicam, Avandia, SSRI Birth Defect Claims, Reglan/Metoclopramide and DePuy ASR, DePuy Pinnacle, Biomet, Wright Medical and Stryker hip implant cases.

3. Mr. Moody is currently licensed to practice law in the State of Virginia, North Carolina, West Virginia and Florida.

4. Mr. Moody serves on Plaintiffs' Discovery Committee – *In re Depuy Orthopaedics, Inc. ASR Hip Implant Products*, MDL 2197.

5. Mr. Moody currently serves as co-counsel on the Plaintiffs' Committee in the Philadelphia Court of Common Pleas Coordinated Reglan/Metoclopramide litigation with respect to discovery matters pertaining to brand defendant Wyeth and its predecessor A.H. Robins and coordinates those activities with the same litigation which is centered in Atlantic County New Jersey in front of the Honorable Judge Carol Higbee.

6. Currently Mr. Moody serves as the only national counsel for the National Association of Retired Veteran Railroad Employees (NARVRE) and represents their membership for all product liability and personal matters pertaining to asbestos, pharmaceutical and medical device related injuries.

7. Mr. Moody serves as Designated Legal Counsel for various rail unions representing their employees in Federal Employers' Liability Act claims. Designated legal counsel are attorneys recognized nationally by railroad labor unions as having exceptional trial capabilities and experience in the handling of railroad worker claims under the Federal Employers' Liability Act. He is currently Designated Legal Counsel for The United Transportation Union (UTU) and the International Brotherhood of Electrical Workers (IBEW). Mr. Moody's law firm also is Designated Legal Counsel for railroad workers who are members of the Transportation Communication Union (TCU), The Brotherhood of Maintenance of Way Employees (BMWE), The Brotherhood of Railway Signalman (BRS), National Conference of Fireman and Oilers (NCFO), Sheet Metal Workers International Association (SMWIA), The International Brotherhood of Boilermakers (IBB).

8. Mr. Moody is a member of the Virginia Trial Lawyers Association, the American Association of Justice, the American Bar Association and serves on the Board of Directors of the Academy of Railway Labor Attorneys. He was recently named as one of Virginia's "Super Lawyers for 2011". Mr. Moody has the highest rating available with Martindale Hubbell's National Law Directory (AV).

9. Through his experience in other product liability litigation involving pharmaceutical companies and medical devices, Mr. Moody is familiar with and works with other attorneys who hold leadership roles on the Plaintiffs' Steering Committee in this litigation

and represents that he works well with those individuals and is willing to serve with and along side those individuals to assist the court in coordinating this litigation.

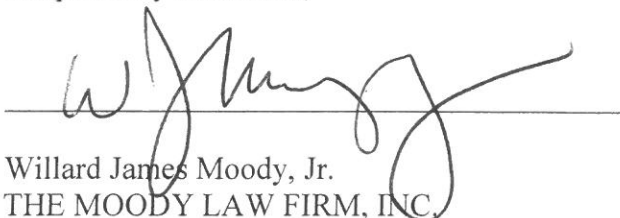
10. Mr. Moody's firm has been heavily involved in discovery document coding work in this litigation since its inception and Mr. Moody has conducted depositions in the Boston Scientific and American Medical Systems, Inc. litigation of James Gooddard, Amy LeBlanc, Maya Matusovsky and Paul Settle and is scheduled to conduct the future depositions of Charles Smith, Karen Prange and Mona Inman, who are other American Medical Systems, Inc. and Boston Scientific witnesses.

11. The Moody Law Firm is based in Portsmouth, Virginia and has been in existence for over 50 years and has represented a broad spectrum of clients in cases venued nationwide and has represented individuals from virtually all 50 states.

Attached for the Court's review is a copy of plaintiff's current and up to date C.V.

Dated: October 17, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Willard James Moody, Jr.', is written over a horizontal line.

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